



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

SENT VIA EMAIL

August 18, 2016

Mr. Joseph Vitale
Ramboll Environ
20 Custom House Street
Suite 800
Boston, MA 02110

re: EPA Administrative Settlement and Order on Consent for Removal Response Action
(CERC-03-2016-0055DA) (Order) and Response Action Plan (RAP)

Dear Mr. Vitale:

EPA has reviewed the Response Action Plan (RAP) for the Metal Bank of America Site submitted on behalf of Respondents to the above-referenced Order. The RAP was prepared by Ramboll Environ and submitted on August 12, 2016 by email.

Section 8.2 of the Order requires Respondents to identify the contractors, subcontractors, and supervisory personnel which will be conducting the Work required in Section 8.3 of the Order. On July 27, 2016, Mr. Dan Jordanger of Hunton & Williams submitted correspondence on behalf of the Respondents indicating Mr. Joseph Vitale (Project Director) and Mr. Nicholas Steenhaut (Project Engineer), of Ramboll Environ, as the entities responsible for development of the RAP. Section 5 of the RAP identifies Mssrs. Vitale and Steenhaut as Project Coordinators. EPA thus presumes that Mr. Joseph Vitale is the Project Coordinator identified pursuant to Section 9 of the Order.

Section 8.4 of the Order requires Respondents to submit for approval a RAP identifying how the Respondents intend to perform the Work required in Section 8.3 of the Order. The Work requirements of the Order include, among other things, submittal of a Health and Safety Plan and expeditious schedule for the implementation of the Work. The RAP simply indicates that Health and Safety Plans will be submitted by the selected contractors/subcontractors. The RAP cannot be approved without the accompanying Health and Safety Plans.

Section 8.7 of the Order requires submittal of a Progress Report seven (7) days subsequent to the approval of the RAP and then every seven days thereafter (or such longer interval as may be determined by the EPA Project Coordinator). This correspondence notifies

Respondents that the Progress Report submittal requirement is herein adjusted as follows: Progress Report #1 to be submitted within 7 days of the approval of the RAP to include any updates to the schedule. Progress Report #2 and Final to be submitted within 7 days of the conclusion of the on-Site work defined in the RAP.

This correspondence informs Respondents that the technical content of the RAP and the identified subcontractor entities can be approved. Yet, the RAP and its schedule cannot be approved without an accompanying Health and Safety Plan. Such complete submittal is herein requested.

This correspondence further notifies Respondents that the grid can be re-established at the Site if needed to clarify the outlines presented in the RAP (the EPA Project Coordinator was able to locate the former grid points). Finally, Respondents are informed that EPA recently installed ground water monitoring wells at the Site and one of these wells is within the area planned for response action. EPA is now preparing to properly abandon this well.

If you have any questions or concerns about the content or intent of this correspondence or need further clarification, then please do not hesitate to contact me at 215-287-2443 or at towle.michael@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Towle", written in a cursive style.

Michael Towle
Project Coordinator
On-Scene Coordinator

cc: Dan Jordanger, Hunton & Williams
Robert Hasson, EPA
Nicholas Steenhaut, Ramboll Environ